

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 98-57 (Phase IV)

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: July 17, 2001

VZ-ATT 1-1: Please explain the collocation power usage issues that Mr. Poretsky dealt with while employed at New York Telephone from 1983 to 1989.

Respondent: Allan Poretsky

RESPONSE: In late 1983, the divestiture agreement led to the split off of the 22 Bell Operating Companies from AT&T into the seven "Baby Bells." At that time, New York Telephone decided to create a district in New York City Network Engineering to do some of the engineering work that, up to that point, was done by Western Electric.

The personnel for this new district came from the Western Electric System Equipment Engineering department that was doing the engineering work for New York Telephone. This new district became known as the Detailed Engineering Services Center or "DESC."

This new district also had responsibility for maintaining the Central Office Records that had been maintained by Western Electric.

As an equipment engineer and engineering manager in the DESC, I was responsible for writing specifications to add equipment in the New York Telephone Central offices and ensuring that the Central Office Records were properly updated and maintained. The records included power assignments and drain table maintenance to ensure that power panels were not overloaded.

One of the earliest projects of the DESC was the installation of equipment in carrier locations for a carrier other than AT&T. These Interexchange Carriers (IXC) started growing as a result of the AT&T breakup. These installations at the carrier's "Point of Presence" (POP) were an early form of collocation.

It became clear to some managers at New York Telephone Company in

the mid 1980s that small local carriers would try to compete with New York Telephone in a way similar to the way IXCs were competing with AT&T. These new local carriers would require access to part of the New York Telephone network to compete.

As a result, the DESC began to explore how such interconnections would be designed. We developed a working model that can be described as a "Black Box." The contents of this Black Box were designed to be controlled by the foreign telephone company, while the DESC planned to design the required interconnections for voice, T1 and power. The actual deployment of the Black Boxes would wait until various regulatory issues were resolved. The first Black Box, or Collocation Cage, was built for Teleport in 1990 at 140 West Street in New York City.

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VZ-ATT 1-2: Please explain the work responsibilities of a New York Telephone Equipment Engineer Manager from 1983 through 1989.

Respondent: Allan Poretsky

RESPONSE: As an equipment engineer and engineering manager in the DESC, I was responsible for writing specifications to add equipment in the New York Telephone Central offices and ensuring that the Central Office Records were properly updated and maintained. The records included power assignments and drain table maintenance to ensure that power panels were not overloaded.

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VZ-ATT 1-3: Referring to Page 2, Line 8 which states "I also have the engineers who work for me take power readings on an almost daily basis at AT&T's collocated equipment throughout the state of New York":

- a. Please describe in detail and provide copies of the methods, practices and procedures used by AT&T to take power readings on AT&T's collocated equipment throughout the state of New York.
- b. Please describe the equipment AT&T uses when taking such readings.
- c. Please provide a description of the experience and training of the engineers referenced on Page 2 who performs the power readings.
- d. On how many of AT&T's collocation sites in Verizon NY's central offices does AT&T conduct power readings during the course of a month?
- e. How many engineers reporting to Mr. Poretsky perform collocation power readings?

Respondent: Allan Poretsky

RESPONSE: a. All Battery Distribution Fuse Bays ("BDFBs") in use today come with manufacturer installed meters that are used to monitor the amperage consumed by the equipment in the cages. These meters remove doubt as to which set of feeders is being monitored and measured and allow AT&T to get the most accurate readings. No special methods, practices or procedures are required to read these manufacturer installed meters.

- b. See response to (a).
- c. The two engineers have a combined experience of over 50 years in Telecommunication. One was a former Western Electric Installer who installed power equipment over the years. This engineer now coordinates the power turn up and modifications with in the cages. The other engineer is a former NYNEX central office engineer who has responsibility for major carrier and related power installations at NYNEX. These two engineers work together as a team to ensure accurate data is collected at the cages.
- d. The number of collocation sites in Verizon NY's central offices that AT&T conducts power readings on during the course of a month may vary from month to month.
- e. 2

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VZ-ATT 1-4: Please provide all documentation of AT&T power readings performed by Mr. Poretsky's engineers in Verizon NY's central offices for the months of April, May, and June of 2001.

Respondent: Allan Poretsky

RESPONSE: AT&T objects to this question as irrelevant and overly burdensome. Without waiving this objection, AT&T has attached sample documentation from three power readings that it has recently performed.

The attachment contains proprietary information and is being provided only to parties which have signed a confidentiality agreement in this docket.

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VZ-ATT 1-5: Please identify how AT&T ensures that the power readings referenced on Page 2 are accurate and verifiable in relation to the power that is ordered from Verizon.

Respondent: Allan Poretsky

RESPONSE: See response to VZ-ATT 1-3(a).

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VZ-ATT 1-6: Please explain whether AT&T considers its current method used to measure power usage in Verizon NY's central offices is more accurate than other methods and, if it is not more accurate than other methods, why AT&T has chosen this method.

Respondent: Allan Poretsky

RESPONSE: For the reasons stated in VZ-ATT 1-3(a), AT&T believes that its current method for measuring power usage in Verizon NY's central offices is more accurate than other methods.

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VZ-ATT 1-7: Please identify and provide the methods and procedures AT&T utilizes that show how the readings are used to ensure that power ordered from Verizon is distributed within collocation cages in the most effective manner.

Respondent: Allan Poretsky

RESPONSE: The procedures for ensuring that the power ordered from Verizon is distributed within the cages in the most effective manner is under ongoing development.

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VZ-ATT 1-8: Does AT&T have engineers who “take power readings on an almost daily basis at AT&T’s collocated equipment” in Verizon MA’s central offices? If so, how many perform this function? If not, why not? If so, please provide all documentation of AT&T power readings performed by its engineers in Verizon MA’s central offices for the months of April, May, and June of 2001.

Respondent: Allan Poretsky

RESPONSE: AT&T does not have engineers who “take power readings on an almost daily basis at AT&T’s collocated equipment” in Verizon MA’s central offices. The vast majority of AT&T’s collocation cages in Massachusetts have a minimal amount of equipment in them and draw less than 10 Amps. AT&T does have some cages in Massachusetts that do have a significant amount of equipment in them, but even in those cages, the power required for the equipment is far less than the power that AT&T has ordered for the cages. Therefore, it is not necessary for AT&T to take power readings in its Massachusetts cages “on an almost daily basis.”

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VZ-ATT 1-9: Referencing Page 3, Lines 22 through 23 and continuing on Page 4 through Line 7:

- a. If a CLEC added 10 amps of power to each feed that was originally specified to be 20 amps per feed, what is the percentage of amps used by the CLEC that is not being paid to Verizon?
- b. Is it Mr. Poretsky's assumption that 100% of the equipment installed by AT&T will try to "draw all the needed power from the surviving panel"?

Respondent: Allan Poretsky

- RESPONSE:
- a. In Mr. Poretsky's example, the CLEC was drawing only 18 amps per feeder despite the fact that the CLEC has ordered 20 amps per feeder. If the CLEC were to add 10 amps to each of these feeders, the CLEC would then be drawing 28 amps per feeder. Because the CLEC had only ordered and paid for 20 amps per feeder and was drawing 28 amps per feeder, Verizon would not be paid for 8 amps per feeder. To determine what percentage of the 28 amps that Verizon is not being paid for, Verizon merely needs to divide 8 by 28. This produces a result of 28.6%.
 - b. For the purposes of the example at page 3 and 4 of Mr. Poretsky's testimony, Mr. Poretsky made it explicitly clear that he was assuming that, if one of the two feeders failed, the AT&T equipment would "draw all the needed power from the surviving panel."

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VZ-ATT 1-10: Provide all documentation and diagrams, including but not limited to technical specifications, that demonstrate the equipment used by AT&T in Verizon MA collocation arrangements has the ability to switch to the other power feeder.

Respondent: Allan Poretsky

RESPONSE: AT&T is required to provide the requested information along with its collocation applications when it submits such applications. Therefore, AT&T has already provided the requested information to Verizon.

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VZ-ATT 1-11: Referencing the statement on Page 4, Lines 16 through 18, stating that “there are limited instances where a CLEC might draw more power than what it has ordered. However, for the reasons stated above, these limited instances are generally the result of problems with CLEC equipment or innocent mistakes made by the CLEC.”

- a. Please identify those “limited” circumstances where the CLEC would draw more power than it has ordered.
- b. Please identify the circumstances in which the consumption of more power would be due to “problems with CLEC equipment.”
- c. Describe in detail how these problems would result in an excessive use of power for more than a momentary spike or surge of power.
- d. Provide any supporting documentation detailing the engineering specifications and operational characteristics of the CLEC equipment that would cause such an occurrence.
- e. Please describe in detail the circumstances in which “innocent mistakes made by the CLEC” would result in the use of more power than what was ordered by the CLEC.

Respondent: Allan Poretsky

RESPONSE: a. On rare occasions, a CLEC may draw more power than was ordered but less than fused. In most cases, if this were to happen it would be the result of a Verizon initiated request that leads to a greater power demand on AT&T’s equipment. Although this would generally trigger a Power Augment request submitted by AT&T to Verizon, if such augmentation was delayed (which, for a variety of reasons,

sometimes happens), it would result in an over-draw situation.

- b. One example of this would be if the manufacturer of the equipment added new services onto the same platform, such as the ability to use optical cards in OC-48s. This might be done by the manufacturer to allow CLECs to take advantage of new tariff offerings, such as line-sharing. These new uses might cause an unintentional over-draw of power.
- c. See response to (a).
- d. See response to VZ-ATT 1-10.
- e. In cages with more than one pair of power feeders, an installation vendor may terminate new equipment on the incorrect panel. This could result in an inadvertent over-draw on one set of feeders and a corresponding under-draw on the other set of feeders. This would have no effect on Verizon or its power plant.

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VZ-ATT 1-12: Referencing the statement on Page 4, Line 21 “CLECs use far *less* power than what they have actually ordered and are paying for”, please provide the names of the CLECs Mr. Poretsky is referring to, provide any documentation in AT&T’s possession regarding the CLEC’s use of DC power, and explain why CLECs utilize power in this manner.

Respondent: Allan Poretsky

RESPONSE: This statement applies to AT&T and Northpoint and probably other CLECs as well.

I have knowledge of Northpoint because, prior to the purchase of the Northpoint assets by AT&T, I was asked to inspect several collocation cages in Manhattan. I met with a Northpoint engineer and we discussed their installation design. Northpoint, unlike AT&T, decided not to do power distribution within their cages. This caused Northpoint to order more power than it needed or used.

There are a number of reasons that a CLEC would use less power than it ordered. For example, the CLEC may wish to have enough power to expand without having to go through the lengthy power augmentation process. Similarly, the CLEC may have unrealistic expectations concerning how fast it will sell services and therefore may order more power than it actually ever uses.

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VZ-ATT 1-13: Referencing the statement on Page 6, Lines 6 through 7, "I have seen instances where Verizon has tapped into power feeders being used by one CLEC in order to also provide power to another CLEC":

- a. Please provide the details and any documentation in AT&T's possession of those instances where Verizon tapped onto a CLEC power lead, including the central office location, date, and any correspondence or documentation to Verizon supporting this statement.

Respondent: Allan Poretsky

RESPONSE: I have personally witnessed this occurring in the Albermarle Road and 55 Masserole Street central offices in Brooklyn. In those particular instances, Verizon was transitioning from using a power board located in the basement to a BDFB located on the floor of the collocation cages. In the process of these transitions, Verizon tapped into both AT&T's and other CLECs' power supplies. Verizon never informed AT&T that it was tapping into AT&T's power supplies.

Until recently, situations such as these were dealt with on-site in an informal manner between the AT&T and Verizon technicians. Such informal resolution allowed AT&T and Verizon to accomplish their goals—keeping customers in service—in a more timely and efficient manner. As a result of the informality of such resolutions, little or no documentation was ever produced. Recently, however, Verizon has requested that AT&T use the Verizon trouble ticket system to deal with collocation power issues. AT&T has complied with Verizon's wishes. Thus, on a going forward basis, more documentation of collocation power problems will be available.

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VZ-ATT 1-14: Referencing the statement on Page 6, Line 4, "I have witnessed power fuses and cables being mislabeled by Verizon."

- a. Please provide the details and any documentation in AT&T's possession of those instances referenced in the above statement, including the central office location, date, and any correspondence or documentation to Verizon supporting this statement.

Respondent: Allan Poretsky

RESPONSE: I have witnessed the mislabeling of power fuses and cables in the Hoe Avenue central office in the Bronx and in the central offices at East 150th Street and East 97th Street in Brooklyn. I witnessed these things at these offices in the 1999 time frame. For example, I witnessed battery cables being labeled as ground cables and ground cables being labeled as battery cables during power turn-ups.

As I stated in the answer to VZ-ATT 1-13, until recently situations such as these were dealt with on-site in an informal manner between the AT&T and Verizon technicians. Such informal resolution allowed AT&T and Verizon to accomplish their goals—keeping customers in service—in a more timely and efficient manner. Thus, there is little, if any, documentation available. Due to the recent increased use of the trouble ticket system, however, on a going forward basis, more documentation of collocation power problems will be available.

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VZ-ATT 1-15: Please provide a list of the types of power distribution configurations implemented by AT&T in its collocated cages in Verizon NY's and Verizon MA's central offices.

Respondent: Allan Poretsky

RESPONSE: In AT&T's collocation cages located in Verizon's central offices, Verizon delivers bulk power to AT&T at the BDFB and then AT&T distributes the power within the cage to its equipment.

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VZ-ATT 1-16: Regarding its collocated equipment in Verizon NY's central offices, is AT&T aware of any situations where AT&T used more power than it had requested from Verizon? If yes, please provide any documentation in AT&T's possession regarding such situations including, but not limited to the number of occurrences the location, the date, and how the problem was rectified.

Respondent: Allan Poretsky

RESPONSE: No.

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VZ-ATT 1-17: Regarding its collocated equipment in Verizon MA's central offices, is AT&T aware of any situations where AT&T used more power than it had requested from Verizon? If yes, please provide any documentation in AT&T's possession regarding such situations including, but not limited to the number of occurrences the location, the date, and how the problem was rectified.

Respondent: Allan Poretsky

RESPONSE: No.